

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

VERONICA KARIUKI

Plaintiff,

v.

ETEAM, INC.

Defendant.

Civil Case No.: 1:15-cv-00934-TSE-JFA

**PLAINTIFF VERONICA KARIUKI'S RESPONSES TO DEFENDANT ETEAM, INC.'S
FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS**

Now comes Plaintiff Veronica Kariuki ("Kariuki"), by counsel, and states the following responses to Defendant eTeam, Inc.'s first Requests for Production of Documents as follows:

DOCUMENT REQUESTS

REQUEST NO. 1: All documents identified or referenced in, or that otherwise support, your Answers to Interrogatories.

RESPONSE: See attached documents. Discovery is ongoing and Plaintiff reserves the right to supplement this answer.

REQUEST NO. 2: All statements you or your attorneys have taken concerning or relating to the events described in your Complaint or the subject matter of this action.

RESPONSE: Plaintiff objects to the request on the grounds that it is overly broad and unduly burdensome; the request fails to define the term "statements." Plaintiff objects to the request to the extent that it seeks to discover any information that is protected by the attorney-client or attorney-



work-product privileges. Subject to and without waiving said objections, none at this time. Discovery is ongoing and Plaintiff reserves the right to supplement this answer.

REQUEST NO. 3: All documents that you intend to introduce at the trial for this matter.

RESPONSE: See attached documents. Discovery is ongoing and Plaintiff reserves the right to supplement this answer.

REQUEST NO. 4: All written reports or complaints of discrimination, if any, that you have made.

RESPONSE: Plaintiff objects to the request on the grounds that it is overly broad and unduly burdensome; the request fails to define the terms “reports” or “complaints.” Plaintiff objects to the request to the extent that it seeks to discover any information that is protected by the attorney-client or attorney-work-product privileges. Subject to and without waiving said objections, see attached EEOC charge. Discovery is ongoing and Plaintiff reserves the right to supplement this answer.

REQUEST NO. 5: Any notes or documents of any kind that you created concerning or relating to the events described in your Complaint.

RESPONSE: Plaintiff objects to the request on the grounds that it is overly broad and unduly burdensome; the request fails to define the terms “notes” or “documents.” Plaintiff objects to the request to the extent that it seeks to discover any information that is protected by the attorney-client or attorney-work-product privileges. Subject to and without waiving said objections, none. Discovery is ongoing and Plaintiff reserves the right to supplement this answer.

REQUEST NO. 6: All documents to support your contention that you were well-qualified for the Field Technician position advertised by Defendant in or about July 2013.

RESPONSE: Plaintiff objects to the request on the grounds that it is overly broad and unduly burdensome; the request fails to define the term “well-qualified.” Plaintiff objects to the request to the extent that it seeks to discover any information that is protected by the attorney-client or attorney-work-product privileges. Subject to and without waiving said objections, see attached resume. Discovery is ongoing and Plaintiff reserves the right to supplement this answer.

REQUEST NO. 7: All documents to support your contention that Defendant discriminated against you based on your gender.

RESPONSE: See attached email from Kumar Nagdev. Discovery is ongoing and Plaintiff reserves the right to supplement this answer.

REQUEST NO. 8: All documents to support your contention that Defendant unlawfully failed to maintain records relevant to whether unlawful employment practices have been or are being committed.

RESPONSE: Plaintiff objects to the request on the grounds that it is overly broad and unduly burdensome; the request fails to define the term “unlawfully.” Subject to and without waiving said objections, see attached EEOC Determination. Discovery is ongoing and Plaintiff reserves the right to supplement this answer.

REQUEST NO. 9: All photographs, videos, voice recordings and/or electronic recordings of any kind concerning or relating to the events described in your Complaint.

RESPONSE: Plaintiff objects to the request on the grounds that it is not reasonably calculated to discover any admissible evidence in the present litigation. Plaintiff objects to the request to the extent that it seeks to discover any information that is protected by the attorney-client or attorney-work-product privileges. Subject to and without waiving said objections, none. Discovery is ongoing and Plaintiff reserves the right to supplement this answer.

REQUEST NO. 10: All documents not specifically called for above which refer, relate to, or support your claim for monetary damages in this matter.

RESPONSE: Plaintiff objects to the request on the grounds that it is a blatant “fishing expedition” calculated to cause unnecessary annoyance and expense to Plaintiff. Plaintiff objects to the request to the extent that it seeks to discover any information that is protected by the attorney-client or attorney-work-product privileges. Subject to and without waiving said objections, no other documents other than what has been specifically called for by Defendant. Discovery is ongoing and Plaintiff reserves the right to supplement this answer.

REQUEST NO. 11: All documents referring or relating to any emotional, psychological or psychiatric conditions you contend you suffer from as a result of the events alleged in your Complaint.

RESPONSE: Plaintiff objects to the request on the grounds that it is not reasonably calculated to discover any admissible evidence in the present litigation. Plaintiff objects to the request on the grounds that it is overly broad and unduly burdensome; the request fails to define the terms

“emotional,” “psychological,” or “psychiatric.” Subject to and without waiving any objections, all such documents remain with Plaintiff’s physicians. Plaintiff’s counsel will submit a HIPPA request. Discovery is ongoing and Plaintiff reserves the right to supplement this answer.

REQUEST NO. 12: All medical records and bills relating to any medical treatment that you have received which you allege was necessary to the actions of Defendant or its agents. With respect to any medical records or bills which are in existence but not in your physical possession, Defendant requests that you execute an authorization form, (a copy of which is attached) for each doctor or hospital where said records exist, to allow Defendant to obtain copies of these records.

RESPONSE: Plaintiff objects to the request on the grounds that it is not reasonably calculated to discover any admissible evidence in the present litigation. Plaintiff objects to the request to the extent that it seeks to discover any information that is protected by the attorney-client or attorney-work-product privileges. Subject to and without waiving any objections, all such documents remain with Plaintiff’s physicians. Plaintiff’s counsel will submit a HIPPA request. Discovery is ongoing and Plaintiff reserves the right to supplement this answer.

REQUEST NO. 13: All personnel and employment records in any way related to your employment for the previous ten years.

RESPONSE: Plaintiff objects to the request on the grounds that it is not reasonably calculated to discover any admissible evidence in the present litigation. Plaintiff objects to the request on the grounds that it is overly broad and unduly burdensome. Subject to and without waiving any

objections, all such documents remain with Plaintiff's previous employers. Discovery is ongoing and Plaintiff reserves the right to supplement this answer.

REQUEST NO. 14: All documents reflecting efforts you have made to gain employment since August 5, 2013.

RESPONSE: Plaintiff applied to jobs through Indeed.com and Monster.com with her resume. Discovery is ongoing and Plaintiff reserves the right to supplement this answer.

REQUEST NO. 15: All written correspondence between you and any representatives of Defendant.

RESPONSE: Please see attached emails between Plaintiff and Kumar Nagdev. Discovery is ongoing and Plaintiff reserves the right to supplement this answer.

REQUEST NO. 16: All documents referring or relating to your application for the Field Technician position with Defendant.

RESPONSE: Please see attached emails between Plaintiff and Kumar Nagdev. Discovery is ongoing and Plaintiff reserves the right to supplement this answer.

REQUEST NO. 17: All federal and state income tax returns that you have filed for the previous five years.

RESPONSE: Plaintiff objects to the request on the grounds that it is not reasonably calculated to discover any admissible evidence in the present litigation. Plaintiff objects to the request on the

grounds that it is overly broad and unduly burdensome. Please see attached tax returns. Discovery is ongoing and Plaintiff reserves the right to supplement this answer.

REQUEST NO. 18: Copies of all resumes and reports, opinions, and conclusions of expert witnesses who you intend to call to testify at the trial in this matter or whom you have consulted in connection with this matter.

RESPONSE: None at this time. Discovery is ongoing and Plaintiff reserves the right to supplement this answer.

REQUEST NO. 19: Copies of all documents that you or your counsel have sent to or received from any expert witnesses whom you intend to call to testify at the trial in this matter.

RESPONSE: Plaintiff objects to the request to the extent that it seeks to discover any information that is protected by the attorney-client or attorney-work-product privileges. Subject to and without waiving said objections, none at this time. Discovery is ongoing and Plaintiff reserves the right to supplement this answer.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that on October 26, 2015, the foregoing Objections was served via U.S. mail, postage prepaid to the following:

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